

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE VANGUARD CHESTER FUNDS  
LITIGATION

Lead Case No. 2:22-cv-00955-ER

**SUPPLEMENTAL DECLARATION  
OF VALERIE M. VERDUCE IN  
SUPPORT OF MOTION TO APPOINT  
INTERIM CLASS COUNSEL**

I, Valerie M. Verduce, declare:

1. I am a named plaintiff and proposed class representative in *Verduce et al. v. Vanguard Chester Funds et al.*, No. 2:22-cv-00955-ER.
2. I have been a practicing attorney for thirty-four years. I am familiar with the rules of ethics and professionalism that govern my professional and personal conduct.
3. I understand that, in its motion to be appointed lead counsel, the Rosen firm stated: “Ms. Verduce has made no representation that when she filed her case, she had obtained prior approval from the FTC to serve as a named plaintiff and class representative in this private class action, or that she had consulted with her agency’s ethics officials.”
4. I can confirm that, before filing this case, I obtained all necessary clearances from my agency to participate in this case as a class representative. As part of that process, I consulted with my agency’s ethics official.

5. I have no professional or personal conflict that prevents me from serving as a class representative in this matter, and I can and will fairly and adequately protect the interests of the class.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 7/7/2022

Signature: 

Executed within the United States in Georgia.